

JORGE L. SANCHEZ, ESQ.
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Phone (702) 635-8529
Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	BK-09-21252-bam
)	
MIROSLAVA CARRILLO-VALADEZ)	
)	CHAPTER 13
)	
)	OPPOSITION TO MOTION FOR RELIEF FROM STAY
)	
)	DATE: November 3, 2009
Debtor(s).)	TIME: 1:30 p.m.

COME NOW the above-named debtor, Miroslava Carrillo-Valadez (hereinafter “Debtor”), by and through her attorney of record, Jorge L. Sanchez, of the law firm of Sanchez Law Group, Ltd., and hereby files the instant Opposition to the Motion for Relief from Stay filed by the secured creditor, U.S. Bank, National Association, as trustee for Citigroup Mortgage Loan Trust Series 2005-809-76718 (hereinafter “U.S. Bank”), in regards to Debtor’s real property located at 9320 Mountain Cliffs Ave., Las Vegas, NV 89129 (the “Subject Property”). In support thereof, Debtor states as follows:

U.S. Bank should not be granted relief from stay because Debtor has made timely payments to the Trustee as is required by her Chapter 13 plan. Proof of Debtor’s payments to the Trustee is attached as Exhibit “A” hereto. U.S. Bank’s claim is among those to be paid by the Debtor’s Chapter 13 Plan. As such, U.S. Bank has received or will receive payments from the Debtor through the confirmed Chapter 13 Plan and has no legal recourse against the debtor and the stay should not be lifted or modified.

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1 WHEREFORE, Debtor, by counsel, respectfully requests this Honorable Court to fully
2 deny the relief requested by U.S. Bank in its Motion for Relief from Stay.

3 Dated this the 28 day of October, 2009.

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5 /s/Jorge L. Sanchez, Esq.
6 JORGE L. SANCHEZ, ESQ.
7 Attorney for Debtor
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1. On October 28, 2009, I served the following document(s):

OPPOSITION TO MOTION FOR RELIEF FROM STAY. I served the above-named document(s) by the following means to the persons as listed below:

a. ECF System

Kathleen A. Leavitt, Chapter 13 Trustee

Gregory L. Wilde, Esq.
Attorney for Creditor, U.S. Bank
Wilde & Associates
208 South Jones Blvd.
Las Vegas, NV 89107

b. Certified United States mail, postage fully prepaid, addressed as follows:

c. Personal Service

I personally delivered the document(s) to the persons at these addresses:

d. By direct email

1 Based upon the written agreement of the parties to accept service by email or a court
2 order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did
3 not receive, within a reasonable time after the transmission, any electronic message or other
4 indication that the transmission was unsuccessful.

5 e. By fax transmission

6 Based upon written agreement of parties to accept service by fax transmission or a court
7 order, I faxed the document(s) to the persons at the fax numbers listed below. No error was
8 reported by the fax machine that I used. A copy of the fax transmission is attached.

9 f. By messenger

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: October 28, 2009

12 /s/Brandy Goodwin/s/

13 An employee of Sanchez Law Group
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